

United States District Court
Eastern District of Washington

Alvin Bernard Pitman

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

FEB 14 2020

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

(In the space above enter the full name(s) of the plaintiff(s).)

2:20-CV-63-SAB

-against-

Case No. _____
(To be filled out by Clerk's
Office only)

Cowles Company (Spokesman Re view) **COMPLAINT**

Jury Demand?

☒ Yes

☐ No

(In the space above enter the full name(s) of the defendant(s).

If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section I. Do not include addresses here.)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Pitmon, Alvin B.
Name (Last, First, MI)
904 West Riverside Ave., #742
Street Address
Spokane, Spokane WA 99201-1011
County, City State Zip Code
509 850-6283 apitmon@gmail.com
Telephone Number E-mail Address (if available)

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Cowles Company (Spokesman Review)
Name (Last, First)
999 West Riverside Ave.,
Street Address
Spokane Spokane WA 99201
County, City State Zip Code

Defendant 2:

Name (Last, First)

Street Address

County, City

State

Zip Code

III. VENUE

This court can hear cases arising out of the Eastern District of Washington.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

*All of the above (1-3), except number 4
are applicable to this action*

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

999 West Riverside Ave

Date(s) of occurrence:

*ASP
19 2005 - 2016*

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What
happened to
you?

*During this period I was subjected
to racial discrimination, sexual
harassment and retaliation; unlaw-
fully had my employment terminated
after the reporting of same to
the company's Corporate HR
(Human Resources)*

All parties involved can be identified at trial

Was
anyone
else
involved?

Jimmy Benson (deceased) did violate Paul caused great mental anguish by making racial slurs during staff meetings, promoted and trained another person to management using corporate funds to send said individual to college to allow him to be qualified for said position. This prevented me from reaching my full potential only because of my race and for reporting said activity to corporate HR.

Gene Hong ^{supervisor} - Consistently and Provocatively sexually harassed me whenever I entered his office in an effort to get me to resign?

Who did
what?

Connie Bantz - HR director
Upon complaints she advised me to seek another job

Ken Clemente - Willfully and unlawfully terminated my employment which is retaliation and unlawful

V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

Mental anguish, PTSD which can be substantiated during trial, monetary loss due to termination of employment. The injuries sustained were so grievous that US EEOC Authorized me the Right to ~~sue~~^{appeal} sue. That permission is no longer applicable as it has been closed. EEOC Charge No, 551-2016-02176

VI. RELIEF

The relief I want the court to order is:

- ☒ Money damages in the amount of: \$ 15 million
- ☐ Other (explain):

VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

2/14/2020
Dated

Alvin B. Pitmon
Plaintiff's Signature

Pitmon, Alvin B.
Printed Name (Last, First, MI)

904 W. Riverside Ave # 742 Spokane WA 99201
Address City State Zip Code

509-850-6283
Telephone Number

apitmon@gmail.com
E-mail Address (if available)

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.